




US IPA RECORDS CENTER REGION 5



513996

## WORK PLAN

Work Assignment No : 33  
EPA Region : 5  
Site Nos. : TGB815106  
Date Prepared : February 1, 1985  
Contract No. : 68-01-7037  
PRC Nos. : 15-0330-46  
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Chief of Administration

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## 1.0 INTRODUCTION

This Work Assignment (WA) is divided into ten sections and two Appendices:

- 1.0 Introduction
- 2.0 Project Approach
- 3.0 Deliverables
- 4.0 Work Schedule
- 5.0 Personnel
- 6.0 Interviews/Subcontractors/Consultants
- 7.0 Exceptions to the Assignment, Anticipated Problems, Special Requirements
- 8.0 Quality Assurance
- 9.0 Cost Estimate
- 10.0 References

Appendix 1 Statement of Work

Appendix 2 LOE Work Assignment Status Report

### 1.1 Background

This WA Plan describes the proposed technical effort and estimated cost for WA 33 under Contract 68-01-7037, Technical Enforcement Support at Hazardous Waste Sites.

The WA will be performed by Interdisciplinary Consulting and Information Research (ICAIR), Life Systems, Inc. (Life Systems). Inquiries concerning the technical aspects of the WA should be directed to Mr. Timothy E. Tyburski, Program Manager. Dr. Roy H. Reuter is the Contract Administrator.

### 1.2 Purpose

An enforcement action under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) has been initiated. This action is on the Reilly Tar hazardous waste site, Site Identification No. TGB815406 in St. Louis Park, MN which is in EPA Region V.

The objectives of this WA are:

1. To provide human toxicology expert witness/technical support to the Environmental Protection Agency (EPA) and the Department of Justice (DOJ) in the investigation and litigation process on this WA as a subcontractor to Planning Research Corporation (PRC) under Contract No. 68-01-7037, Technical Support at Hazardous Waste Sites (TES II).
2. To provide effective Program and Work Assignment management of the expert witness/consulting support effort as a subcontractor to PRC under Contract No. 68-01-7037, Technical Support at Hazardous Waste Sites (TES II).

## 2.0 PROJECT APPROACH

### 2.1 Approach

The ICAIR approach to expert witness/technical support WAs is designed to insure that products are produced on time, in the proper format, with appropriate technical emphasis at a reasonable cost. Specifically, ICAIR undertakes the following tasks.

1. Carefully reviews the WA upon receipt.
2. Carefully reviews any background material.
4. Initiates discussion with EPA/DOJ technical contact to clarify any ambiguities and to insure that EPA/DOJ requirements are fully addressed.
5. Develops detailed selection criteria.
6. Conducts a pre-screening of potential nominees.
7. Presents a nominees' information packet to EPA/DOJ for review. The packet contains a brief narrative summary of the individual's qualifications and experience; a complete resume and copies of two relevant journal articles, authored or co-authored by the nominee.
8. Assists throughout the selection process.
  - a. Conference calls
  - b. Face-to-face meetings
9. Drafts and provides detailed instructions to nominees. Examples of products and specifications to meet format and technical requirements are provided.
10. Negotiates cost-effective rates because fee negotiations with experts are handled by an individual specializing in procurement.
11. Requires monthly progress updates from technical performers.
12. Monitors progress against milestones and to EPA/DOJ requirements. ICAIR, Life Systems drops experts that do not perform satisfactorily from the roster.
13. Consults with EPA/DOJ to insure that end products meet the desired purpose.

### 2.2 Statement of Work

The effort of this WA is divided into six tasks. An outline for the Statement of Work (SOW) is provided below. Appendix 1 contains the complete SOW and should be reviewed for greater detail and amplification of the outline.

#### Task

##### 1.0 Review the WA and background material.

- 1.1 Review the WA.
- 1.2 Initiate discussions with EPA/DOJ technical contacts.

2.0 Expert witness identification and selection.

2.1 Receive notification of selection of each expert witness from EPA.

3.0 Prepare assignments for each nominee and each approved expert witness.

3.1 Obtain signed statements from each nominee and each selected expert witness.

3.2 Initiate procurement action to retain each selected expert witness.

a. Prepare and transmit the assignment for each selected expert witness to perform the WA.

4.0 Perform technical support activities for the Reilly Tar Site investigation and litigation.

4.1 Provide technical support in accordance with technical direction from the EPA Technical Contact.

4.2 Upon completion of all technical aspects of this Assignment, return all Privileged Information to EPA/DOJ.

5.0 Incorporate Life Systems' information management functions.

5.1 Prepare and submit WA Planning Document.

5.2 Prepare and submit to the Program Manager the input for Monthly Summary Progress Reports.

6.0 Incorporate the management needed to successfully meet the WA's Cost, Schedule and technical Performance (CSP) objectives.

6.1 Perform WA Planning.

6.2 Perform internal WA management activities.

6.3 Perform external management activities including interfaces with EPADOJ/PRC.

3.0 DELIVERABLES

3.1 To ICAIR from PRC

Written notification from PRC of WA Plan approval.

3.2 To PRC from ICAIR

Table 3-1 lists the Deliverables (including Line Item Number, Life Systems Data Number, Description or Title of each Deliverable, Due Date, Statement of Work (SOW) Task Number and the distribution of the Deliverables) that will be prepared in meeting the objectives of the WA. A Final Report is not required for this WA.

TABLE 3-1 DATA REQUIREMENTS LIST (DRL)

Line Item No.	Life Systems' Data Number, TR-	Description/Title	Due Date	SOW Task No.	Copies	
					No.	To
1	693-14	WA Plan	01/16/85	5.1	1 4	Brisbin Van Osten
2	N/A <sup>(a)</sup>	Selected documents per instructions from EPA, such as:  a. Evaluation of back- ground information b. Affidavit summarizing health effects c. Deposition	TBD <sup>(b)</sup>	4.0	1	Bitter

(a) N/A = Not Applicable.

(b) TBD = To Be Determined.

#### 4.0 WORK SCHEDULE

The period of performance of WA 33 for the Reilly Tar Site Investigation and Litigation is 10 months.

Milestones established for this WA are listed below according to milestone number cited in the LOE Work Assignment Status Report (Appendix 2). This represents Life Systems' estimate for the WA schedule. Deviations of interim milestones may be experienced and communicated to Life Systems as Technical Direction, but may not extend past the prevailing Contract completion date (currently September 30, 1986).

<u>No.</u>	<u>Description</u>	<u>Completion Date</u>
1.	Submit WA Plan.	01/16/85
2.	Receive Approval of WA Plan.	01/31/85
3.	Identify/Schedule Expert.	01/16/85
4.	Begin Expert Witness/Technical Support.	01/16/85
5.	Completion of Expert Witness/Technical Support.	09/30/85
6.	WA Closeout.	10/31/85

The work schedule by Task is shown in Figure 4-1.

#### 5.0 PERSONNEL

This WA will be managed by Mr. Timothy E. Tyburski. Timothy is the Program Manager for the Contract. The expert witness/consultant identification process requires close interaction between EPA/DOJ/ICAIR to insure that the best possible individuals are retained. The ICAIR approach detailed in Section 2.1 provides the basis of this process. It is not possible at this time to identify the expert witnesses/consultants who will be performing on this WA. However, nominees are identified by ICAIR to the EPA Technical Contact for determination of the nominee to be retained as an expert witness/consultant.

##### 5.1 Organization

Timothy reports to Dr. Roy Reuter, Corporate Vice President in charge of ICAIR. Roy in turn reports to Dr. Rick Wynveen, Life Systems' President.

##### 5.2 Key Personnel

The key person for this WA is the WA Manager, Mr. Timothy E. Tyburski.



Month After Receipt of Award

TASK DESCRIPTION	1984			1985												1986									
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	
1.0 Review WA and Background Material				□																					
2.0 Expert Witness Identification and Selection				□																					
3.0 Preparation of Technical Assignment Packages				□																					
4.0 Performance of Litigation Support Actions				□																					
5.0 WA Administration				□																					
6.0 WA Management				□																					
Monthly Reports				△	△	△	△	△	△	△	△	△													

FIGURE 4-1 WORK SCHEDULE SYNOPSIS

### 5.3 Responsibility Delegation

Mr. Timothy E. Tyburski has been authorized to implement the work delegated to him and for which he is responsible through:

- a. Management approval of the WA Plan.
- b. Management approval of the program/project assignment budget forms which itemize the work to be done and establish money levels to be spent for the work.

### 6.0 INTERVIEWS/SUBCONTRACTORS/CONSULTANTS

None.

### 7.0 EXCEPTIONS TO THE ASSIGNMENT, ANTICIPATED PROBLEMS, SPECIAL REQUIREMENTS

#### 7.1 Exceptions to Assignment

The ICAIR estimate of 77 LOE hours and 129 Expert Witness hours is shown in Section 9.0 (Cost Estimate). The ICAIR estimate is based on performance of the tasks identified in the SOW (Appendix 1).

#### 7.2 Anticipated Problems

No problems in accomplishing the Statement of Work are anticipated at this time.

#### 7.3 Special Requirements

The special requirements to accomplish the Statement of Work are divided into contractual factors and other factors as shown below:

- a. Contractual factors. None.
- b. Other factors. None.

### 8.0 QUALITY ASSURANCE

The PRC's Quality Assurance (QA) Program, dated April 23, 1984, has been specifically incorporated by reference into the contract governing this Work Assignment. This Work Plan and all subsequent activities and outputs may correspondingly be the subject of a random audit pursuant to that QA program plan, and carried out by the Contract QA officer. The audit results and any corrective action will be included in the Monthly Progress Report and Annual Report.

## 9.0 COST ESTIMATE - Work Assignment No. 33

HOURS

PRC LOE	8
Life System LOE	77
Total LOE	-----85-----
PRC Clerical	4
Life Systems Clerical	82
Total Clerical	-----86-----
TOTAL HOURS	-----171----- -----

Dollars

Direct Labor	\$ 2,932
Travel	3,778
ODCs	7,994
Indirect Costs	8,643
Subtotal Costs	\$ -----23,347-----
Fee	1,788
Total WA Cost Estimate	\$ -----25,135----- -----

APPENDIX 1

STATEMENT OF WORK

ICAIR shall furnish all materials, supplies, personnel, facilities, equipment and management to carry out the work set forth in this WA.

Task

1.0 Review the WA and background material.

- 1.1 Review the background material provided with the WA, the WA itself, and other pertinent background material available to Life Systems.
- 1.2 Initiate discussions with EPA/DOJ technical contacts as appropriate to clarify any ambiguities associated with the WA and to determine precise requirements for effective execution of the WA.

2.0 Expert witness identification and selection.

- 2.1 Receive notification of selection of each expert witness from EPA.

3.0 Prepare assignments for each nominee and each approved expert witness. Assignments for each nominee and for each selected expert witness provide the necessary instructions, Scope of Work, and background material to ensure that the efforts required by the WA or by the selection process are performed in accordance with EPA/DOJ requirements.

- 3.1 Obtain a signed "Statement of Familiarity and Compliance With Privileged Information" and obtain a signed "Special Restriction Applicable to Expert Witnesses" from each nominee and each selected expert witness.
- 3.2 Initiate procurement action to retain each selected expert witness.

- a. Prepare and transmit the assignment for each selected expert witness to perform the WA.

4.0 Perform technical support activities for the Reilly Tar Site investigation and litigation.

- 4.1 Provide technical support in accordance with technical direction from the EPA Technical Contact to include tasks such as the following:

- a. Review data analysis reports and background information provided by EPA/DOJ.
  - b. Identify, acquire and review additional key literature and information.
  - c. Prepare and submit technical documents in accordance with provided content and format specifications, as requested by EPA/DOJ.

- d. Submit hard copies of key references cited in technical documents, as requested by EPA/DOJ.
  - e. Prepare and submit an Affidavit in accordance with content and format specifications provided by EPA/DOJ.
  - f. Provide telephone technical advice to EPA/DOJ staff to assist in preparation of the case.
  - g. Attend case development meeting(s) at a location(s) and schedule requested by the EPA Technical Contact.
  - h. Attend the pre-trial meeting.
  - i. Provide deposition and/or assistance in the deposing of opposition experts.
  - j. Prepare and/or respond to interrogatories.
  - k. Attend the trial and provide expert witness testimony.
- 4.2 Upon completion of all technical aspects of this Assignment, return all Privileged Information to EPA/DOJ.
- 5.0 Incorporate Life Systems' information management functions to provide internal procedures for control of the collection, preparation, quality, assessment, distribution and maintenance of information and documentation. This activity shall include preparation and submittal of the WA's Data Requirement Items.
- 5.1 Prepare and submit WA Planning Document. Prepare and submit the WA Plan.
- 5.2 Prepare and submit to the Program Manager the input for Monthly Summary Progress Reports.
- a. Obtain Monthly Progress Reports from each expert witness.
  - b. Prepare Monthly LOE Work Assignment Status Report updates.
  - c. Prepare technical inputs for Monthly Summary Progress Reports.
  - d. Prepare technical inputs for Monthly WA Progress Report.
- 6.0 Incorporate the management needed to successfully meet the WA's Cost, Schedule and technical Performance (CSP) objectives and requirements to result in EPA satisfaction.
- 6.1 Perform WA Planning.
  - 6.2 Perform internal WA management activities.
  - 6.3 Perform external management activities including interfaces with EPA/DOJ/PRC.

# LOE WORK ASSIGNMENT STATUS REPORT

WA No 07 Proj No 1393  
Date (Mo/Yr) 01/85

Title: EXPERT WITNESS SUP. FOR REILLY TAR INVESTIGATION AND LITIGATION

WA Price \$ 23,350

LOE Hrs. 77

WA Plan No. TR-693-14

Contract No. 68-01-7037

Customer PRC

Contract Type ☒ Cost Plus Fixed Fee  
☐ Fixed Price

Personnel:

PM Mr. T. E. Tyburski

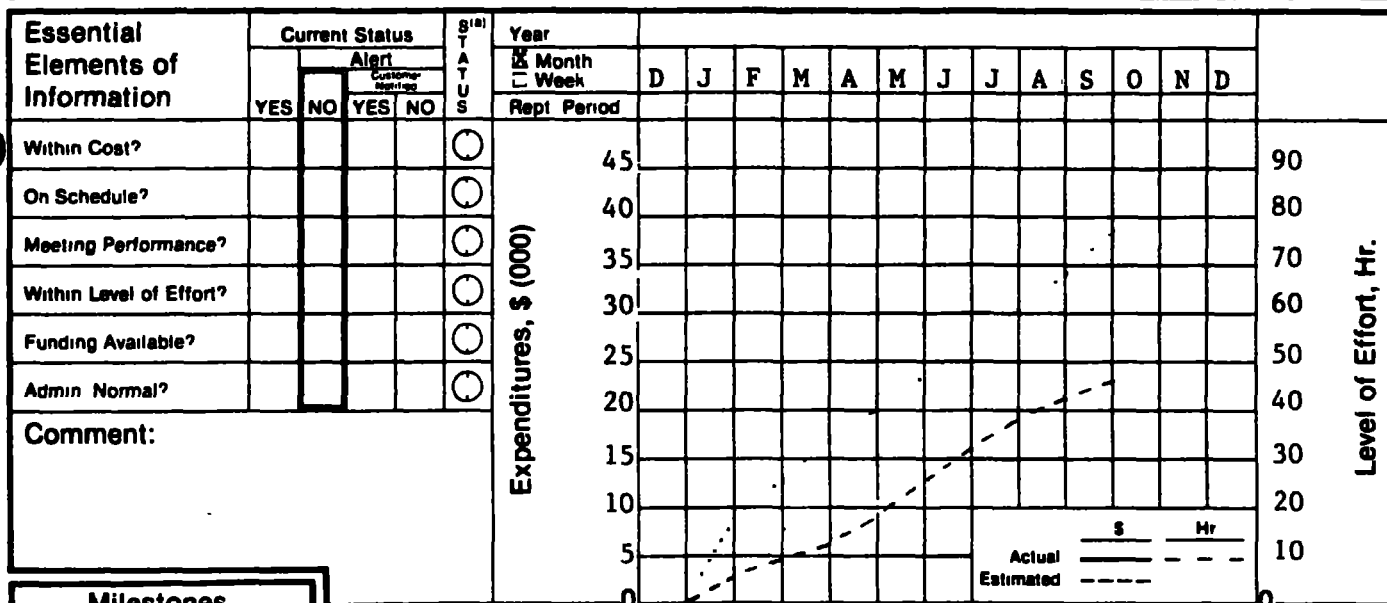
TM Mr. T. E. Tyburski

Description:

1. Identify/schedule expert witness
2. Provide technical support for Reilly Tar Site investigation and litigation

End-Items:

1. WA Plan
2. Technical Support as directed



## Milestones

1	WA Plan submitted																			
2	WA Plan approval received																			
3	Identify/schedule expert																			
4	Begin Reilly Tar Site Support																			
5	Comp. Reilly Tar Site Support																			
6	WA Closeout																			

Program Highlights:

Approved: *Timothy E. Tyburski* 01/22/85 Prog Mgr./Date

Acknowledged: *Ray. R.* 1/23/85 Bus. Area Mgr./Date

a Status Key ○ = Progress Normal ● = Minor Deviation ● = Problem Area

2/1/85  
E.4

ROUTING AND TRANSMITTAL SLIP

Date

2/8/85

TO: (Name, office symbol, room number,  
building, Agency/Post)

Initials

Date

1. Paul Ketter

2. cc: Bob Levinizer

3. Dan Hopkins

4.

5.

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

Please review the attached  
TES work plan for Billy  
I am expect with less support  
& let me know if it  
meets with your approval  
by Thurs., February 14.

Thanks.

DO NOT use this form as a RECORD of approvals, concurrences, disposals,  
clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

Room No.—Bldg.

Chris Gryboski

Phone No.  
6-7576

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